CONWAY, FARRELL, CURTIN & KELLY, P.C.

ATTORNEYS AT LAW
48 Wall Street, 20th Floor
New York, New York 10005
(212) 785-2929
Fax: (212) 785-7229

Robert S. Delmond (212) 993-9321 rdelmond@conwayfarrell.com LONG ISLAND OFFICE 55 Maple Avenue – Suite 506 Rockville Centre, New York 11570 (212) 785-2929 fax (516) 255-4696

(Filed via ECF)

April 8, 2014

United States District Court Southern District of New York Thurgood Marshall United States Courthouse 40 Foley Square, Room 415 New York, New York 10007

Attn: Vernon S. Broderick, United States District Judge

Re: SMG, an infant by his parents and natural guardian ATAVIA MOORER

v. SCO FAMILY OF SERVICES, et al

Index #: 1:14-cv-00815- (VSB) (SN)

Dear Justice Broderick:

This firm represents the defendants SCO Family of Services, Darlene Ellison, Gail Nayowith, John Roe and Jane Doe in this matter. Previously, pursuant to our letter motion, the court granted our request for a pre-answer conference regarding motions to dismiss. At present, the conference is scheduled for May 1, 2014.

On April 1, 2014, we received the co-defendant City of New York's Answer with cross-claims. We requested that the City consent to extend our time to answer the cross-claims until such time as the pre-motion conference was conducted and a decision rendered with regard to whether motions to dismiss would be considered by the Court. The City consented to an extension.

At this time we are requesting an extension of time in which to answer the City's cross-claims to be determined during the conference currently scheduled for May 1, 2014.

Thank you for your assistance in this matter.

Very truly yours,

Robert S. Delmond (RSD 9724)